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September 7, 2020

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Victoria Palma-Brea
20 Cr. 199 (KMW)

Dear Judge Wood:

I write on behalf of Ms. Palma-Brea in the above referenced matter. Ms. Palma-Brea respectfully request a modification of her bail conditions to allow her to travel to the Dominican Republic to attend the wedding of her brother on February 21, 2021. If permitted she would leave New York on February 20, 2021 and return on February 28, 2021. Ms. Palma-Brea would reside at her brother's reside in Santo Domingo.

Pre-trial officer Ovalles states that his office takes no position on International travel requests, but notes that Ms. Palma-Brea has been in compliance with the terms of her supervision. The Government does not consent to this request.

Respectfully submitted,
/s/
Donald duBoulay

cc: Branden Harper, AUSA
Kedar Bhatia, AUSA
Marlon Ovalles, PTO

Because there is risk of flight in light of Court One's 2-year mandatory minimum, and a separate Court alleging obstruction of justice, the request to travel is denied.

SO ORDERED, N.Y., N.Y.

9/11/2020

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.